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Attorneys for Plaintiff  
FACEBOOK, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

FACEBOOK, INC.,

Plaintiff,

v.

POWER VENTURES, INC. a Cayman Island  
Corporation; STEVE VACHANI, an  
individual; DOE 1, d/b/a POWER.COM,  
DOES 2-25, inclusive,

Defendants.

Case No. 5:08-cv-05780 JW

**DECLARATION OF MORVARID  
METANAT IN SUPPORT OF  
FACEBOOK, INC.'S REPLY IN  
SUPPORT OF MOTION TO  
COMPEL DEFENDANTS TO  
PERFORM THOROUGH SEARCH  
FOR RESPONSIVE DOCUMENTS  
AND FOR PRODUCTION THEREOF**

Judge: Hon. James Ware  
Courtroom: 15, 18th Floor

1 I, Morvarid Metanat, hereby declare and state as follows:

2 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel  
3 of record to Facebook, Inc. in the above-captioned matter. I make this declaration based on my  
4 personal knowledge, unless otherwise noted. If called, I can and will testify competently to the  
5 matters set forth herein.

6 2. Attached hereto as **Exhibit Q** is a true and correct copy of a Notice of Subpoena to  
7 Ed Niehaus, served August 16, 2011.

8 3. Attached hereto as **Exhibit R** is a true and correct copy of a letter from Timothy  
9 Fisher to Morvarid Metanat, dated September 1, 2011.

10 4. Attached hereto as **Exhibit S** is a true and correct copy of Non-Party Ed Niehaus's  
11 production document, bearing Bates Nos. Niehaus 00089-93. **[DESIGNATED HIGHLY**  
12 **CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER—LODGED UNDER SEAL]**

13 5. Attached hereto as **Exhibit T** is a true and correct copy of Non-Party Ed Niehaus's  
14 production document, bearing Bates Nos. Niehaus 00001-2. **[DESIGNATED HIGHLY**  
15 **CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER—LODGED UNDER SEAL]**

16 6. Attached hereto as **Exhibit U** is a true and correct copy of Non-Party Ed Niehaus's  
17 production document, bearing Bates Nos. Niehaus 00056-64. **[DESIGNATED HIGHLY**  
18 **CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER—LODGED UNDER SEAL]**

19 7. Attached hereto as **Exhibit V** is a true and correct copy of Non-Party Ed Niehaus's  
20 production document, bearing Bates Nos. Niehaus 00078-81. **[DESIGNATED HIGHLY**  
21 **CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER—LODGED UNDER SEAL]**

22 8. Attached hereto as **Exhibit W** is a true and correct copy of Non-Party Ed  
23 Niehaus's production document, bearing Bates Nos. Niehaus 00229-230. **[DESIGNATED**  
24 **HIGHLY CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER—LODGED**  
25 **UNDER SEAL]**

26 9. Attached hereto as **Exhibit X** is a true and correct copy of Non-Party Ed Niehaus's  
27 production document, bearing Bates Nos. Niehaus 00545-557. **[DESIGNATED HIGHLY**  
28 **CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER—LODGED UNDER SEAL]**

1           10.     Attached hereto as **Exhibit Y** is a true and correct copy of Non-Party Ed Niehaus's  
2 production document, bearing Bates Nos. Niehaus 00610-631. **[DESIGNATED HIGHLY**  
3 **CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER—LODGED UNDER SEAL]**

4           11.     Attached hereto as **Exhibit Z** is a true and correct copy of a Notice of Subpoena to  
5 Leigh R. Power, served August 19, 2011.

6           12.     Attached hereto as **Exhibit AA** is a true and correct copy of a letter from Leigh  
7 Power to Jeff Cox, signed August 29, 2011.

8           13.     Attached hereto as **Exhibit BB** is a true and correct copy of Non-Party Leigh  
9 Power's production document, bearing Bates No. LP00437.

10          14.     Attached hereto as **Exhibit CC** is a true and correct copy of Non-Party Leigh  
11 Power's production document, bearing Bates No. LP00438.

12           I declare under penalty of perjury that the foregoing is true and correct to the best of my  
13 knowledge. Executed this 13th day of September, 2011 at Menlo Park, California.

14  
15 Dated: September 13, 2011

ORRICK, HERRINGTON & SUTCLIFFE LLP

16  
17 */s/ Morvarid Metanat*  
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19 MORVARID METANAT  
20 Attorneys for Plaintiff  
21 FACEBOOK, INC.  
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